UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JEFFERIES LLC, Plaintiff, v. WTW INVESTMENT COMPANY, LTD., PAULA TURNBULL KNOX, as trustee of Turnbull Marital Trust, WILLIAM STANTON, JANET STANTON, JEFFREY DWORKIN, ROBERT ANDERSON, ALEJANDRO CABRERA, JOHN GONZALEZ, KENNETH BARNETT, MARK A. HADJA, BROOKS BARKLEY, SARAH BARKLEY, ANDREW WILLIAMS, RICHARD HOEDEBECK, SALLY HOEDEBECK, BETH ERWIN, BRIAN BECK, STEVEN RIEBEL, as trustee of Riebel Living Trust, JENNIE D. PRICE, RENOUARD INVESTMENTS, LLC, PAUL THOMPSON, DAVID N. PEDERSON, TODD R. BROWN, JEFFREY MILLER, MICHAEL SULLIVAN, LORI BOWEN, PHYLLIS K. CLARK, RICHARD LONGORIA, MARK E. TRIVETTE, TARAK PATEL, MAROON FEGHALI, JOSEPH N. FEGHALI, ELIE N. FEGHALI, ROBERT S. TYLER, DONNELLA R. TYLER, THOMAS G. KEYSER, CONSTANCE LINDSEY, and RUSTY McDOWELL, Defendants.	CIVIL ACTION NO. 3:17-CV-0332-D

PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Northern District of Texas Local Civil Rule 56, Plaintiff Jefferies LLC ("Jefferies") opposes Defendants' Motion for Summary Judgment and hereby cross-moves for summary judgment in its favor. Jefferies has separately filed a Response and Brief in Opposition to Defendants' Motion for Summary Judgment and in Support of its Cross-Motion for Summary Judgment (the "Brief") and an Appendix in Support of Cross-Motion for Summary Judgment (the "Appendix"), both of which Jefferies incorporates herein by reference. The required matters in Local Civil Rules 56.3(a) and 56.4(a) are set forth in Jefferies' accompanying Brief.

WHEREFORE, PREMISES CONSIDERED, Jefferies respectfully requests that the Court deny Defendants' Motion for Summary Judgment, grant its Cross-Motion for Summary Judgment, and issue the declaratory and injunctive relief contained in the accompanying proposed order.

Dated: March 10, 2017

Respectfully submitted,

/s/ William R. Thompson, II

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CERTIFICATE OF SERVICE

The undersigned certifies that on March 10, 2017, a true and correct copy of the foregoing document and related attachments have been served on Plaintiff's counsel via electronic mail.

/s/ William R. Thompson, II
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